

# EXHIBIT 1

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1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF TEXAS  
3 CORPUS CHRISTI DIVISION

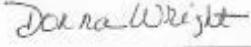
4 TYLER ALLEN CLICK, ET )  
5 AL., )  
6 Plaintiffs, )  
7 VS. ) Case No. 2:18-CV-00455  
8 )  
9 GENERAL MOTORS LLC,, )  
10 Defendant. )

11 ORAL AND VIDEOTAPED DEPOSITION OF  
12 HOMERO MEDINA  
13 FEBRUARY 17, 2021  
14 (REPORTED REMOTELY)

15  
16 ORAL AND VIDEOTAPED DEPOSITION OF HOMERO MEDINA,  
17 produced as a witness at the instance of the Defendant,  
18 and duly sworn, was taken in the above-styled and  
19 numbered cause on February, from 9:15 a.m. to  
20 11:09 a.m., before Donna Wright, CSR No. 1971, in and  
21 for the State of Texas, reported by machine shorthand  
22 and remotely via Zoom, pursuant to the Federal Rules of  
23 Civil Procedure, the 22nd Emergency Order Regarding the  
24 COVID-19 State of Disaster, and any provisions stated  
25 on the record or attached hereto.

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<p>1 Q. Open Exhibit No. 2. Excuse me.</p> <p>2 A. Bless you.</p> <p>3 Q. Thank you.</p> <p>4 A. Okay.</p> <p>5 (Exhibit 2 marked)</p> <p>6 Q. (BY MS. ROSS) So the version we got of this,</p> <p>7 I can't read. And I -- my first question for you is do</p> <p>8 you recognize this document?</p> <p>9 A. Yes, that's the -- that's my third-party</p> <p>10 insurance, the United Vision insurance that's on the</p> <p>11 truck.</p> <p>12 Q. Okay.</p> <p>13 A. And I have -- I have actually -- I don't know</p> <p>14 if I have that one, but I do have the newer one, so...</p> <p>15 Q. Okay. I don't know that we need your -- this</p> <p>16 is just your liability insurance that covers your</p> <p>17 truck?</p> <p>18 A. Yeah. That's just one of the insurances that</p> <p>19 I have on the truck.</p> <p>20 Q. Okay. And you said you still have at least</p> <p>21 the current version of this?</p> <p>22 A. Oh, yes. The truck has always been covered,</p> <p>23 fully covered.</p> <p>24 Q. Okay. You can close that out and open</p> <p>25 Exhibit 3.</p>	<p>1 A. Okay. Well, let me -- can't you guys do a</p> <p>2 CamScan and scan on CamScan and come out clearer?</p> <p>3 Q. I'm sorry. Can we what?</p> <p>4 A. CamScan? They have different filters and it</p> <p>5 should come out perfectly.</p> <p>6 Q. Well, I just asked if you could work with your</p> <p>7 attorney --</p> <p>8 A. Okay. Okay.</p> <p>9 Q. -- to find a way to get us a clearer copy --</p> <p>10 A. Sorry.</p> <p>11 Q. -- because we just can't read the document.</p> <p>12 I think I can read enough to see the</p> <p>13 signatures on the bottom of the first page. The</p> <p>14 signature on the left at the bottom of the first page</p> <p>15 of Exhibit 3, is that your signature?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. You can close that.</p> <p>18 A. Okay.</p> <p>19 Q. And then you can just leave it in the marked</p> <p>20 exhibit folder. We're going to come back to the other</p> <p>21 two in a minute.</p> <p>22 A. Okay.</p> <p>23 Q. Okay. So I think before we took our break we</p> <p>24 were talking about service and maintenance and repair</p> <p>25 to your -- to your vehicle. And you said that other</p>
Page 35	Page 37
<p>1 (Exhibit 3 marked)</p> <p>2 THE WITNESS: Okay.</p> <p>3 Q. (BY MS. ROSS) And this document has a little</p> <p>4 number at the bottom that says Medina 00002 through -3.</p> <p>5 I'm not sure why the exhibit sticker was so tiny.</p> <p>6 Perhaps the court reporter can fix that for us in the</p> <p>7 final version.</p> <p>8 But, again, this document seems to be a</p> <p>9 photograph of the document, and it's very hard for me</p> <p>10 to read. But do you know what this is?</p> <p>11 A. Yes, this is the contract I signed to buy the</p> <p>12 vehicle.</p> <p>13 Q. Okay. And can I ask that you -- do you still</p> <p>14 have this document?</p> <p>15 A. I honestly do not know.</p> <p>16 Q. Okay.</p> <p>17 A. Because I went through a lot of stuff. Like</p> <p>18 after I initially had conversations with the attorney</p> <p>19 that I talked to and I sent this stuff to, so I would</p> <p>20 actually have to go look for it. I'm not -- I'm not</p> <p>21 for sure.</p> <p>22 Q. Okay. Can I ask that you do look for it? And</p> <p>23 if you find the document, please provide it to your</p> <p>24 attorney so that they can scan it and send us a clearer</p> <p>25 copy?</p>	<p>1 than the fuel pump issue there were no other repairs</p> <p>2 needed to the truck and it has otherwise been perfect</p> <p>3 other than that?</p> <p>4 A. Yes.</p> <p>5 Q. Why don't you tell me about what happened with</p> <p>6 your fuel pump.</p> <p>7 A. From when it went out, basically?</p> <p>8 Q. When did you first have a problem with your</p> <p>9 truck?</p> <p>10 A. The first time I had a problem with my truck</p> <p>11 with the fuel pump was basically the last time I had a</p> <p>12 problem with my fuel pump. It went out all of a sudden</p> <p>13 with no warning. So it just -- basically my truck just</p> <p>14 turned off.</p> <p>15 Q. When was that?</p> <p>16 A. Excuse me?</p> <p>17 Q. When was that?</p> <p>18 A. Oh, my gosh. Like the exact date?</p> <p>19 Q. The best you can recall.</p> <p>20 A. I don't know. I can't think right now. But</p> <p>21 I -- I do know that it happened when my truck was at a</p> <p>22 hundred -- about 100,000 miles. So over -- over a year</p> <p>23 ago, I believe.</p> <p>24 Q. Was it in 2019?</p> <p>25 A. I can't recall, ma'am. All I know is that --</p>

<p style="text-align: right;">Page 66</p> <p>1 MS. RICKERT: Objection to form.      2 THE WITNESS: No. To my knowledge, it's      3 the people that bought the product and they are not      4 happy with the product.      5 Q. (BY MS. ROSS) Do you believe that everyone      6 who's purchased a GM vehicle with a 6.6 Duramax diesel      7 engine has had a fuel pump problem?      8 A. I can't -- I really can't say, because I don't      9 know. All I know is the people that I've seen and the      10 people in my experience.      11 Q. Who have you spoken with about this lawsuit?      12 A. Nobody but the people on here and the initial      13 person I talked to over the phone, and my      14 ex-girlfriend.      15 Q. And I believe I already asked you this, but      16 just in case I didn't, do you know any of the other      17 plaintiffs in this case?      18 A. No, I do not.      19 Q. You've never met them?      20 A. No, ma'am.      21 Q. You've never spoken with them?      22 A. No, ma'am.      23 Q. So unless Ms. Rickert has some questions for      24 you, I think that that's all I have for you today. I      25 would just say again on the record that I ask that you</p>	<p style="text-align: right;">Page 68</p> <p>1 2 3 4 -- SIGNATURE REQUIRED -- 5 * * * * * 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 67</p> <p>1 provide a copy of your purchase invoice for your      2 vehicle to your attorney so that they can scan it and      3 provide us with a legible copy.      4 A. Okay.      5 MS. RICKERT: Yes, we can do that. And I      6 don't have any questions.      7 MS. ROSS: That's all we have for you      8 today, Mr. Medina. Thank you so much for your time,      9 especially considering the weather emergency you all      10 are experiencing. I hope you stay warm and safe.      11 MR. MEDINA: Oh, no, all the shelves are      12 empty over here so I'm staying at home.      13 MS. RICKERT: Thank you, April.      14 THE VIDEOGRAPHER: We are off the record      15 at 11:09 a.m.      16 MS. ROSS: Donna, do you need any      17 information from us?      18 THE VIDEOGRAPHER: Donna, I took us off      19 the record at 11:09.      20 MS. ROSS: Thank you.      21 THE REPORTER: Bonnie, would you like the      22 electronic copy?      23 MS. RICKERT: We would like signature and      24 the transcript.      25 (Proceedings concluded at 11:09 a.m.)</p>	<p style="text-align: right;">Page 69</p> <p>1 UNITED STATES DISTRICT COURT      SOUTHERN DISTRICT OF TEXAS      CORPUS CHRISTI DIVISION      3 TYLER ALLEN CLICK, ET AL., )      Plaintiffs, ) Case No. 2:18-CV-00455      5 VS. )      GENERAL MOTORS LLC, Defendant. )      7      8 REPORTER'S CERTIFICATION OF THE ORAL      DEPOSITION OF HOMERO MEDINA      FEBRUARY 17, 2021      (REPORTED REMOTELY)      11 I, Donna Wright, a Certified Shorthand      Reporter and Notary Public in and for the State of      Texas, hereby certify to the following:      14 That the witness, HOMERO MEDINA, was remotely      15 duly sworn by the officer and that the transcript of the      16 oral deposition is a true record of the testimony given      17 by the witness;      18 That the original deposition was delivered to      19 Ms. Bonnie Rickert.      20 That a copy of this certificate was served on      21 all parties and/or the witness shown herein on      22 March 1, 2021.      23 I further certify that pursuant to FRCP Rule      24 30(3) that the signature of the deponent:      25 __X__ was requested by the deponent or a party</p>

1 before the completion of the deposition and that the	Page 70	Page 72
2 signature is to be before any notary public and		
3 returned within 30 days from date of receipt of the		
4 transcript. If returned, the attached Changes and		
5 Signature Page contains any changes and the reasons		
6 therefore:		
7 _____ was not requested by the deponent or a		
8 party before the completion of the deposition.		
9 I further certify that I am neither counsel		
10 for, related to, nor employed by any of the parties or		
11 attorneys in the action in which this proceeding was		
12 taken, and further that I am not financially or		
13 otherwise interested in the outcome of the action.		
14 Certified to by me on this, the 1st day of		
15 March, 2021.		
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19		
20 Donna Wright, CSR No. 1971		
21 Expiration Date: 12-31-2021		
22 VERITEXT		
23 515 Congress Avenue		
24 Suite 1700		
25 Austin, Texas 78701		
Firm Registration No. 571		
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